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16 *Attorneys for Defendants Zuffa, LLC and  
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18 UNITED STATES DISTRICT COURT

19 FOR THE DISTRICT OF NEVADA

20 KAJAN JOHNSON and CLARENCE  
21 DOLLAWAY, on behalf of themselves and all  
others similarly situated

22 Plaintiffs,

23 v.

24 ZUFFA, LLC (d/b/a Ultimate Fighting  
25 Championship and UFC) and ENDEAVOR  
26 GROUP HOLDINGS, INC.,

27 Defendants.

Civil Case No.: 2:21-cv-01189-RFB-BNW

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING DEADLINE TO  
FILE JOINT DISCOVERY PLAN  
(First Request)**

Plaintiffs Kajan Johnson and Clarence Dollaway, by and through their counsel of record, and Defendants Zuffa, LLC and Endeavor Group Holdings, Inc., by and through their counsel of record, hereby stipulate to extend the time in which the parties must file a Joint Discovery Plan/Scheduling Order. *See* ECF No. 17.

On September 10, 2021, Defendants filed and served a Motion to Dismiss the Class Action Complaint. *Id.* On September 14, 2021, the parties filed a stipulation and proposed order extending Plaintiffs' deadline to respond to Defendants' Motion to Dismiss until October 22, 2021, and Defendants' deadline to file a reply until November 18, 2021. ECF No. 21. On September 15, this Court granted the parties' stipulated request. ECF No. 22.

The parties' deadline to file a joint discovery plan and scheduling order is currently set for October 25, 2021. ECF No. 17. Although the parties have begun to discuss the issues required by Federal Rule of Civil Procedure 26(f), there are still outstanding issues for the parties to discuss. In light of that fact and that briefing on Defendants' motion to dismiss is not yet complete, the parties have agreed to a 60-day extension to file the joint discovery plan. This is the parties' first stipulation for an extension of time to submit a joint discovery plan. Under this stipulation, the joint discovery plan and scheduling order will be due on December 24, 2021.

## Order

## IT IS SO ORDERED

**DATED:** 10:04 am, October 22, 2021

*Brenda Weksler*  
**BRENDA WEKSLER**  
**UNITED STATES MAGISTRATE JUDGE**

Respectfully submitted,

October 21, 2021

## BERGER MONTAGUE PC

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